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16 **IN THE UNITED STATES DISTRICT COURT**

17 **FOR THE DISTRICT OF ARIZONA**

18 Kashane Kirk, *et al.*,

19 Plaintiffs,

20 vs.

21 City of Phoenix, *et al.*,

22 Defendants.

23 Case No.: CV 23-00836-MTL (CDB)

24 **DEFENDANTS' UNOPPOSED
25 MOTION FOR EXTENSION OF
REPLY DEADLINE**

26 **(FIRST REQUEST)**

Defendants' Unopposed Motion for Extension of Reply Deadline

1 Defendants City of Phoenix, Phoenix Police Department, Chief Michael Sullivan,
2 Autumn Ladines, Officer Antonio Garza, Sergeant Eric Roy, Jaclyn Ravelo, Steven Ramirez
3 and Jonathan Howard (collectively referred to hereinafter as "Defendants"), by and through
4 counsel undersigned, hereby move for a brief extension of the deadline for them to Reply in
5 Support of Their Motion to Dismiss (Dkt. 29) ("Motion") which Reply is currently due
6 November 24, 2023. For the reasons set forth below, Defendants seek an extension of only
7 one (1) week to Reply to December 1, 2023. This is the first requested extension of this
8 deadline, is made for good cause and should not prejudice Plaintiff. The undersigned
9 represents that she has contacted Plaintiff's attorney, Sean Woods, and he has agreed not to
10 oppose this extension to reply on behalf of defendants.
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1 This request is also made in good faith and not for the purpose of delay. Lead counsel
2 for Defendants will be out of office for the Thanksgiving holiday with a limited workload
3 while she spends time with family. Additionally, the newest associate at lead counsel's law
4 firm has begun to assist her in this matter. He has passed the bar exam and is expected to be
5 admitted to practice before this Court in mid-December. While this associate is in the process
6 of learning the issues and applicable law in this case, lead counsel has needed to devote
7 additional time to training him and reviewing his work product. Additionally, Plaintiffs'
8 Response raises a number of arguments that require additional research and consideration by
9 Defendants. As such, this brief, one-week extension, will provide Defendants adequate time
10 to prepare a meaningful reply to Plaintiffs' Response.

11 Therefore, Defendants respectfully request an extension to Reply in Support of their
12 Motion to Dismiss (Dkt. 29) to December 1, 2023.

13 | RESPECTFULLY SUBMITTED this 21st day of November, 2023.

BROENING OBERG WOODS & WILSON, P.C.

16 By /s/ Sarah L. Barnes
17 Sarah L. Barnes
18 Kelley M. Jancaitis
19 Attorney for Defendants City of Phoenix,
20 Sullivan, Ladines, Garza, Roy, Ravelo,
21 Ramirez and Howard

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2023, I electronically transmitted the foregoing with the Clerk of the Court using the CM/ECF system for filing, with copies submitted electronically to the following recipients:

Sean A. Woods
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/s/ *Kathy Lake*